LAW OFFICES OF

## **DRATEL & LEWIS**

29 BROADWAY Suite 1412 NEW YORK, NEW YORK 10006

TELEPHONE (212) 732-0707 FACSIMILE (212) 571-3792 E-MAIL: llewis@dratellewis.com

JOSHUA L. DRATEL LINDSAY A. LEWIS

FATOUMATA MAGASSA

Paralegal

July 5, 2022

## **BY ECF**

The Honorable Jesse M. Furman United States District Judge Southern District of New York Thurgood Marshall Courthouse 40 Centre Street New York, New York 10007 Application GRANTED. The Clerk of Court is directed to terminate Doc. #768. SO ORDERED.

July 5, 2022

Re: *United States v. Luis Blondet*, 16 Cr. 387 (JMF)

## Dear Judge Furman:

This letter is respectfully submitted on behalf of defendant Louis Blondet (whom Louis M. Freeman, Esq., and I represent), and respectfully requests an extension to July 11, 2022, from July 5, 2022, of the due date for Mr. Blondet's Reply to the government's opposition to his motion pursuant to Rule 29, Fed.R.Crim.P. Counsel for co-defendant Julio Marquez-Alejandro has informed me that Mr. Marquez joins in this application. I have also been in contact with Assistant United States Attorneys Justin V. Rodriuez, and he has informed me that the government does not object to this request.

The reasons for the requested extension are that while I was supposed to attend a wedding this past weekend and return to New York today (a fact I did not calculate in the prior extension request), in fact I had a family medical crisis to which I had to attend and devote a considerable amount of time (and could not attend the wedding). That remains ongoing to some extent. In addition, I am simultaneously preparing for a trial in *United States v. Olajumoke*, 19 Cr. 291 (LAP), that begins July 11, 2022. Mr. Olajumoke is the sole defendant, and I am his sole counsel. That, too, of course, has required substantial attention and time. Moreover, the July 11 date would permit sufficient time for circulation among counsel for Mr. Marquez-Alejandro to determine whether he will join in the Reply.

LAW OFFICES OF

## **DRATEL & LEWIS**

Hon. Jesse M. Furman United States District Judge Southern District of New York July 5, 2022 Page 2 of 2

Accordingly, it is respectfully requested that the due date for Mr. Blondet's and Mr. Marquez-Alejandro's Reply submission in support of their Rule 29 motion(s) be extended until July 11, 2022. As noted above, the government does not object to this request.

Respectfully submitted,

Johne P. Wets

Joshua L. Dratel

JLD/